

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE CAPACITORS ANTITRUST
LITIGATION

THIS DOCUMENT RELATES TO THE DIRECT
PURCHASER CLASS ACTION

MDL Case No. 3:17-md-02801-JD
Case File No. 3:14-cv-03264-JD

**JOINT PROPOSED JURY INSTRUCTIONS
AND VERDICT FORMS**

Trial Date: November 29, 2021
Time: 9:00 a.m.
Courtroom: 11, 19th Floor
Judge: Hon. James Donato

Pursuant to the Court's Pretrial Order No. 1 for Direct Purchaser Class Trial, MDL ECF No. 1565, the parties respectfully submit the following Joint Proposed Jury Instructions and Verdict Forms, attached hereto as Exhibit 1, Exhibit 2, and Exhibit 3.

1 Dated: November 12, 2021

/s/ Joseph R. Saveri

2 Joseph R. Saveri (State Bar No. 130064)
3 Steven N. Williams (State Bar No. 175489)
4 Anupama K. Reddy (State Bar No. 324873)
5 Christopher K.L. Young (State Bar No. 318371)
6 **JOSEPH SAVERI LAW FIRM, LLP**
7 601 California Street, Suite 1000
8 San Francisco, California 94108

Lead Counsel for the Direct Purchaser Class

9 Dated: November 12, 2021

10 By: /s/ Bonnie Lau
11 Bonnie Lau

12 Bonnie Lau (State Bar No. 246188)
13 Margaret A. Webb (State Bar No. 319269)
14 **MORRISON & FOERSTER LLP**
15 425 Market Street
16 San Francisco, California 94105-2482
17 Telephone: (415) 268-7000
18 Facsimile: (415) 268-7522

19 David Cross (Admitted *pro hac vice*)
20 Mary G. Kaiser (State Bar No. 288741)
21 **MORRISON & FOERSTER LLP**
22 2100 L. Street, NW, Suite 900
23 Washington, D.C. 20037
24 Telephone: (202) 887-1500

Counsel for Defendant Matsuo Electric Co., Ltd.

1 Dated: November 12, 2021

2
3 By: /s/ Joseph J. Bial
Joseph J. Bial

4 Charles F. Rule (admitted pro hac vice)
5 Joseph J. Bial (admitted pro hac vice)
6 Leah Hibbler (pro hac vice pending)
7 PAUL, WEISS, RIFKIND, WHARTON &
8 GARRISON LLP
2001 K Street, NW
9 Washington, DC 20006
Telephone: (202) 223-7300
Facsimile: (202) 223-7420

10 Roberto Finzi (admitted pro hac vice)
11 Farrah R. Berse (admitted pro hac vice)
12 Johan E. Tatoy (admitted pro hac vice)
13 PAUL, WEISS, RIFKIND, WHARTON &
14 GARRISON LLP
1285 Avenue of the Americas
15 New York, NY 10019-6064
Telephone: (212) 373-3830
Facsimile: (212) 757-3990

16 Steven Kaufhold (SBN 157195)
17 KAUFHOLD GASKIN GALLAGHER LLP
485 Pacific Avenue
18 San Francisco, CA 94133
Telephone: (415) 881-3189
19 Facsimile: (415) 480-6076

20 Counsel for Defendants Nippon Chemi-Con
21 Corporation and United Chemi-Con, Inc.

ATTESTATION

Pursuant to Civil Local Rule 5.1(i)(3), I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: November 12, 2021

/s/ Joseph R. Saveri
Joseph R. Saveri